

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AHMIRH NORTHERN

Inmate No. 20004699

500 Cheyney Road

Thornton, PA 19373

v.

v.

Docket No.: 2:23-cv-4488

GEO CORRECTIONS AND

DETENTION, LLC

621 NW 53 ST

Boca Raton, Florida

and

DELAWARE COUNTY D/B/A

GEORGE W. HILL

CORRECTIONAL FACILITY

500 Cheyney Rd

Thornton, PA 19373

and

LAURA K. WILLIAMS

Individually and in her office capacity as

Warden

500 Cheyney Rd

Thornton, PA 19373

and

DELE FALY

Individually and in his official capacity as

Deputy Warden of Programs and Support

500 Cheyney Rd

Thornton, PA 19373

and

LISA MASTRODDI

Individually and in her official capacity as

Deputy Warden of Operations and

Administration

500 Cheyney Rd :
Thornton, PA 19373 :
:
and :
:
SERGEANT COLEMAN :
Individually and in his official capacity as :
Chief of Security :
500 Cheyney Rd :
Thornton, PA 19373 :

NOTICE OF REMOVAL

**TO: THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA:**

Defendants, Delaware County, Laura K. Williams, Dele Faley, Lisa Mastroddi and Sergeant Coleman, by and through its attorneys, Burns White, LLC, give notice of removal of the above-captioned action from the Court of Common Pleas of Delaware County, Pennsylvania, in which this action is now pending, to the United States District Court for the Eastern District of Pennsylvania, pursuant to 28 U.S.C. §§1331, 1443, and 1446, and in support thereof aver as follows:

1. Plaintiff commenced this action by Complaint on or about November 18, 2022.
2. Plaintiff filed an Amended Complaint in this matter on October 20, 2023, adding the Moving Defendants herein.
3. Plaintiff, Ahmirh Northern, has raised §1983 federal civil rights claims in his Amended Complaint and thus this Court has original jurisdiction and this case is subject to removal pursuant to 28 U.S.C. §1331 and §1443(2). *See* Exhibit “A”.
4. The Moving Defendants, having been included in this lawsuit for the first time on October 23, 2023, have filed this Notice within 30 days and thus removal of this matter is timely.

5. The record from the State Court is attached, which includes Exhibit “A”, Plaintiff’s Amended Complaint. *See* Court Docket attached as Exhibit “B.”

WHEREFORE, Defendant hereby gives notice of removal of the above action now pending in the Court of Common Pleas of Delaware County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania. This action will proceed in this Court as an action properly removed thereto.

BURNS WHITE, LLC

By: /s/ Matthew H. Fry
MATTHEW H. FRY
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